

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
AT BALTIMORE DIVISION**

In re:

**DAVID BO HYEON LIM
AKA BO HYEON LIM**

Debtor

CHAPTER 7

CASE No. 09-27116-DWK

THE DONG-A ILBO,

Movant,

v.

**DAVID BO HYEON LIM
AKA BO HYEON LIM**

and

GEORGE W. LIEBMANN, TRUSTEE,

Respondents.

**DECLARATION OF HYUN SUK CHOI IN SUPPORT OF THE DONG-A ILBO'S
MOTION TO DISMISS THE DEBTOR'S CHAPTER 7 BANKRUPTCY PETITION**

I, HYUN SUK CHOI, declare under penalty of perjury that:

1. I am an attorney of the law firm of The Park Law Group, LLC, counsel for the movant, The Dong-A Ilbo, in this action.
2. I make this declaration in support of The Dong-A Ilbo's Motion to Dismiss the Debtor's Chapter 7 Bankruptcy Petition.

3. A true and correct copy of First Amended Verified Complaint in The Dong-A Ilbo v. Bo H. Lim, et al., United States District Court, Eastern District of Pennsylvania, Civil Action No. 08-2399 (GP) (“EDPA Action”) is attached as Exhibit A.

4. True and correct copies of Dun & Bradstreet report, Experian Business Reports, and Gale Group, Inc.’s report concerning Korean Daily Tribune a/k/a Dong-A Daily News is attached as Exhibit B.

5. A true and correct copy of a letter from David Bohyeon Lim to Daniel Kim, dated January 4, 2007, which was attached to the complaint concerning Daniel Kim v. STV Networks, Inc., Court of Common Pleas, Montgomery County, Pennsylvania, Civil Action No. 2008-29321, is attached as Exhibit C.

6. A true and correct copy of the court’s orders, dated November 3, 2008, in the EDPA Action is attached as Exhibit D.

7. A true and correct copy of Memorandum of Law in Support of Defendants’ Motion to Dismiss, filed on January 29, 2009, in the EDPA Action is attached as Exhibit E.

8. A true and correct copy of Motion of Counsel for Defendant David Lim for Leave to Withdraw as Counsel, filed on May 12, 2009, is attached as Exhibit F.

9. A true and correct copy of the court’s order, dated June 1, 2009, in the EDPA Action is attached as Exhibit G.

10. A true and correct copy of the court’s order, dated July 6, 2009, in the EDPA Action is attached as Exhibit H.

11. A true and correct copy of Status Report, filed on July 16, 2009, in the EDPA Action is attached as Exhibit I.

12. A true and correct copy of the court’s order, filed on dated August 31, 2009, in

the EDPA Action is attached as Exhibit J.

13. A true and correct copy of the Debtor's Chapter 7 bankruptcy petition, filed on September 11, 2009, is attached as Exhibit K.

14. A true and correct copy of the court order, dated September 14, 2009, in the EDPA Action is attached as Exhibit L.

15. A true and correct copy of the court's docket as of November 10, 2009 concerning the EDPA Action is attached as Exhibit M.

16. A true and correct copy of Purchase and Sale Agreement between Korean Daily Tribune, Inc. and STV Networks, Inc. ("STV"), dated February 5, 2008, which was attached to STV's motion to dismiss, filed on December 4, 2008, in the EDPA Action is attached as Exhibit N.

17. A true and correct copy of the complaint in Daniel Kim v. STV Networks, Inc., Court of Common Pleas, Montgomery County, Pennsylvania, Civil Action No. 2008-29321 is attached as Exhibit O.

18. A true and correct copy of the court's docket in the Debtor's bankruptcy proceeding as of November 13, 2009 is attached as Exhibit P.

19. A true and correct copy of a Real Property Data Search issued by the Maryland Department of Assessments and Taxation for the Debtor's property located at 13135 Hidden Acres Lane, Bishopville 21813 is attached as Exhibit Q.

20. A true and correct copy of the title search report concerning the Debtor's property located at 13135 Hidden Acres Lane, Bishopville, Maryland 21813 is attached as Exhibit R.

21. A true and correct copy of the Articles of Incorporation for a Close Corporation concerning Jacobs Farm, Inc., which was obtained from the website of the Maryland Department

of Assessments and Taxation is attached as Exhibit S.

22. A true and correct copy of information concerning Hasqvarna multipurpose utility vehicle, Model No. HUV4210E XP, *available at* <http://www.husqvarna.com/us/landowner/products/utility-vehicles/huv4210e-xp/> is attached as Exhibit T.

23. A true and correct copy of the Complaint Objecting to the Dischargeability of a Debt filed by G.E. Money Bank in connection with this action is attached as Exhibit U.

24. A true and correct copy of the Debtor's amended schedules filed on November 6, 2009 is attached as Exhibit V.

25. A true and correct copy of the Trustee's Object to Debtor's Exemption in Lawsuit Proceeds filed on November 9, 2009 in this action is attached as Exhibit W.

26. A true and correct copy of the Company Profile *available at* <http://www.manta.com/company/mt9sdb>s concerning Jacobs Farm, Inc. is attached as Exhibit X.

27. A true and correct copy of the Amended Chapter 7 Individual Debtor's Statement of Intention, filed on November 6, 2009, is attached as Exhibit Y.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 16, 2009

/s/ Hyun Suk Choi
HYUN SUK CHOI